

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

RICHARD W. GATES III,

Defendant.

Crim. No. 17-201-2 (ABJ)

**JOINT MOTION TO BEGIN PRESENTENCE INVESTIGATION REPORT PROCESS**

COMES NOW, the United States of America, by and through the United States Attorney for the District of Columbia, and the defendant through his counsel, and file this joint motion to respectfully request that the Court order the Probation Office to begin the process of drafting the defendant's presentence investigation report.

1. On February 28, 2018, the defendant pled guilty pursuant to a cooperation plea agreement.

2. To date, the defendant continues to cooperate with the government as required by his plea agreement. He is a potential witness in two upcoming trials before this Court, *United States v. Craig*, 19-CR-125 (ABJ), to begin on August 12, 2019, and *United States v. Stone*, 19-CR-18 (ABJ), to begin November 5, 2019. He has also been advised by the District Attorney's Office for the County of New York that he will be called to testify in the trial of Paul Manafort at some point in 2020.

3. Because the defendant has been cooperating for an extended period of time, and because of the defendant's personal matters described to the Court in ECF No. 608 at n. 1, the defendant wishes to be sentenced as soon as possible after the completion of his cooperation with

the United States. The government has no objection to scheduling a sentencing date after the aforementioned trials are finished and defendant's cooperation has been completed.

4. The parties respectfully suggest that in the interim, the Probation Office could begin the process of drafting its presentence investigation report in this case so that, if the Court sees fit, the defendant's sentencing can be scheduled soon after his cooperation has been completed. The presentence investigation report will then be complete and available to the Court and the parties at that time.

5. Accordingly, the parties respectfully request that the Court order the Probation Office to begin the process of preparing the defendant's presentence investigation report.

Respectfully submitted,

JESSIE K. LIU  
UNITED STATES ATTORNEY

/s/  
Fernando Campoamor Sánchez (DC 451210)  
Molly Gaston (VA 78506)  
United States Attorney's Office for D.C.  
555 4<sup>th</sup> Street NW  
Washington, D.C. 20530  
Telephone: (202) 252-7698  
*Attorneys for the United States of America*

/s/  
Thomas C. Green (D.C. Bar No. 14498)  
Sidley Austin LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
tcgreen@sidley.com  
(202) 736-8069 (telephone)  
*Attorney for Richard W. Gates III*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

v.

**RICHARD W. GATES III,**

**Defendant.**

**Crim. No. 17-201-2 (ABJ)**

**[PROPOSED]  
ORDER**

Upon consideration of the parties' Joint Motion to Begin Presentence Investigation Report Process, and for good cause shown, it is hereby

**ORDERED** that the Probation Office should begin the process of composing the presentence investigation report for the defendant.

DATED: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Amy Berman Jackson  
United States District Judge

Certificate of Service

I hereby certify that by virtue of the ECF system, I have caused a copy of the foregoing joint motion to be served on counsel for the defendant.

/s/  
Molly Gaston  
Assistant United States Attorney